

EPA Official Record

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Subject: New Bedford Harbor-Proposed CAD Cell Comment

EPA Officials:

I am submitting this comment to you regarding the proposed CAD cells for New Bedford Harbor. Your EPA meetings have spent an enormous amount of time explaining the feasibility of the actual CAD cell yet were lacking in the process used to handle this disposal. This is unacceptable not to reveal the serious consequences that would result in our air quality if this method is used. The amount of PCBs, heavy metals, and other undisclosed contaminants that are in this highly contaminated harbor for so many years due to industrial dumping with over one hundred illegal pipes that were used to dispose hazardous wastes would all contribute to air emissions using this proposed method.

While reviewing the "FINAL EVALUATION OF THE IMPACT OF DREDGING AND CAD CELL DISPOSAL ON AIR QUALITY NEW BEDFORD HARBOR SUPERFUND SITE, NEW BEDFORD, MA" prepared by Jacobs Engineering Group, ACE-J23-35BG0702-M17-0011, on your website for New Bedford Harbor, I cannot understand how you can even continue to propose this unsafe method that is not protective of human health.
<http://www.epa.gov/ne/nbh/pdfs/466822.pdf>

On page 3-5 of this report, it states that there are "four potential sources of airborne PCBs that may occur during the filling of the CAD cell:

the exposed dredge bucket,
the surface of the open barge,
the disturbed water surface due to disposal, and
ponded water/sediment within the CAD cell before capping."

As stated in this report on page 2-3, " These releases would be in addition to on-going 'natural' PCB emissions from the NBH Site's contaminated sediments, especially from contaminated mudflats exposed to open air at low tide."

This method would not only be a major contributor to air quality, it is also a violation of environmental justice in the New Bedford community given the very high population of minorities, low income, disabled, and others.

The last EPA meeting in New Bedford on July 29, 2010, you brought in a gentleman who spoke on other CAD cells used in New England, namely, Boston, Providence, Hyannis, etc. harbors. Not one of them had CAD cells with PCBs. Why is New Bedford the target one more time for toxic material to be disposed of in an unsafe way after previously you proposed an incinerator which in fact you wanted to make it a regional incinerator whereby we would incinerate not only our own toxic PCB waste but that of other communities around New England?

You have built a multi-million dollar dewatering and desanding facility to currently treat PCB waste after which you send it by train to an appropriate landfill in Michigan properly placed to handle this type of material. Keep doing this with all of the contamination in the entire harbor. Again, this harbor has a multitude of toxic material in addition to PCBs. Continue to hydraulic dredge this sediment, pipe underwater to the desanding and dewatering facility and send it out.

This to me, is the only safe method to handle such deadly material protective enough of human health.

Sincerely,
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